



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, DC 20460

OFFICE OF
PESTICIDES AND
TOXIC SUBSTANCES

MEMORANDUM

SUBJECT; Workgroup on Acifluorfen Residues in Ground Water

TO: Addressees

FROM: Joanne I. Miller *JIM 11/15/89*
Registration Division Acting Product Manager

A Meeting has been scheduled for the workgroup on Acifluorfen Residues in Ground Water. The Meeting will take place November 20, 1989 at 9:00 a.m. in conference Room 1023.

Please plan to attend this meeting or have someone from your branch attend. The workgroup include members from RD, SRRD, EFGWB, BEAD, and HED. A copy of the memorandum is attached. If you have any questions the contact person is Mary C. Erumsele 557-0546.

ADDRESSEES

Mary Erumsele, FHB/RD
David Alexander, SRRD
Elizabeth Behl, EFGWB
Tom Lominello, GCSB 728C
Catherine EIDEN, EFGWB
Larry Schnaubelt SRRD
Whang Phang, TOX/HFA
Bernie Schneider, BEAD



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NOVEMBER 6, 1989

MEMO RANDUM

SUBJECT: Workgroup on Acifluorfen Residues in Ground Water

TO: Frank Sanders, Chief
Fungicide-Herbicide Branch
Registration Division (H7505C)

THRU: Henry Jacoby, Acting Chief
Environmental Fate and Ground-Water Branch
Environmental Fate and Effects Division (H7507C)

FROM: Catherine Eiden, Acting Chief
Environmental Chemistry Assessment Section
Environmental Fate and Effects Division (H7507C)

The workgroup on acifluorfen met on 10/19/89. We discussed the impacts of acifluorfen on ground water and possible actions to limit that impact. The workgroup should include members from RD, SRRD, EFGWB, BEAD, and HED.

Back ground

Acifluorfen has been classified as a (B2) carcinogen and has demonstrated the potential to leach to ground water under worst-case conditions as established under a small-scale prospective ground-water monitoring study in the Central Sands of Wisconsin. Residues moved to shallow ground water within 3-4 months of application. Over 10 months, concentrations of acifluorfen reached 1-46 ppb exceeding the one-in-a-million risk level of 1 ppb. The registrant continues to monitor the plume, as it moves off site. Levels of acifluorfen increased with continued monitoring.

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The conditions under which the residues leached to ground water included vulnerable soils, shallow ground water, and heavy irrigation. These soil conditions are not representative for all acifluorfen use areas. Therefore, the registrants (Rhone-Poulenc and BASF) are currently organizing to conduct small-scale retrospective ground-water monitoring studies at representative sites in the U.S.

EFGWB is very interested in identifying other acifluorfen usage areas in the U.S. that may be similarly vulnerable as the Central Sands of Wisconsin, where the prospective study was conducted. Identifying these areas will require BASF and Rhone - Poulenc involvement as usage data and information on agricultural practice associated with acifluorfen use will be necessary.

*Reg. Grant
by Rhone-Poulenc
*
BASF*

EFGWB is also concerned that this chemical could potentially contaminate ground water during the mixing, loading and cleaning of equipment. Generally, chemicals that are equally persistent and mobile as acifluorfen have been detected in ground water as a result of point source pollution. RD should consider this potential source of ground-water contamination in its risk management decision.

The registrant (Rhone - Poulenc) of TACKLE has offered to amend state labels to restrict the use of their product in eight counties in Wisconsin and two counties in New York (Rhone - Poulenc has very limited sales of their product in these two states).

CAN DRPSTIS identify other areas of concern

Conclusion

The workgroup met and agreed upon one initial action: issuance of a 3c2b data call-in letter requiring the registrants to identify all acifluorfen usage areas as vulnerable as the Central Sands of Wisconsin. We believe they have equally vulnerable use areas in Florida on peanuts, for example.

Issues

- o What regulatory actions, if any, should be taken on the current BLAZER and TACKLE registrations, at this time?
 - o Should OPP prohibit the use of acifluorfen products in all usage areas identified as similarly vulnerable as or more vulnerable than the Central Sands of Wisconsin?
 - o Should the use of acifluorfen be considered for classification as "Restricted Use"?
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- Should OPP wait to take regulatory action on the registration of acifluorfen until after the retrospective ground-water monitoring studies' results are submitted and evaluated?

Recommendation

1. The registrants and RD, EFGWB should meet to discuss the identification of vulnerable use areas of acifluorfen - containing products besides Wisconsin and New York.
2. We recommend an internal meeting of the workgroup on 11/20 prior to the 11/21 meeting planned with the registrants to discuss the issues and impact of the second phase of monitoring small-scale retrospective studies on these issues.

cc: Anne Barton
Anne Lindsay
Rick Tinsworth

(prospective) within original DCI -
5 sites chosen by Registrants
were not approved by

- we should

- Current of EC w/D. Phylaxide put together with concerning restricted use DLI for 302B

— Will BSAFE & Rhine Bank agree to voluntary Restriction

— Check on the registrations?

Exhibit A + B
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40N content

for a general health advisory